



GELLERT
SCALI
BUSENKELL
& BROWN, LLC

Bradley P. Lehman, Esquire
302-416-3344
blehman@gsbblaw.com

March 31, 2023

Via ECF

The Honorable Douglas E. Arpert, U.S.M.J.
United States District Court
for the District of New Jersey
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *Daniel Francisco, et al. v. Peter S. Cooke, Jr., et al.*,
Civil Action No. 21-14575-GC-DEA

Dear Judge Arpert:

As Your Honor will recall, I represent the plaintiffs in the above-captioned action and write to provide a joint status update in this matter. Since New Jersey's enactment of new legislation which eliminated the "justifiable need" standard for obtaining a concealed carry license following the Supreme Court's *Bruen* decision, while also imposing new restrictions on where and under what circumstances license holders are permitted to lawfully carry their concealed firearms, the parties have continued their discussion about how to resolve disputes concerning the specific permits issued to the individual plaintiffs in this case.

While the plaintiffs still expect to amend their complaint to address their issues with the new statutory regime in New Jersey concerning the carrying of concealed firearms, the parties believe it would be worthwhile to complete their discussions about restrictions placed on plaintiffs' individual licenses. Plaintiffs intend to amend the complaint after those discussions have been completed or at an earlier date if a near-term resolution of those issues is not forthcoming.

Thank you for your consideration. Counsel are available at the convenience of the Court should Your Honor have any questions.

Respectfully submitted,

/s/ Bradley P. Lehman

cc: All Counsel (via ECF)